

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

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FTX TRADING LTD. and MACLAURIN  
INVESTMENTS LTD.,

Plaintiffs,

- against -

LOREM IPSUM UG, PATRICK GRUHN,  
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

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Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 23-50437 (JTD)

**DECLARATION OF STEPHEN EHRENBURG  
IN SUPPORT OF PLAINTIFFS' MEMORANDUM OF LAW  
IN OPPOSITION TO DEFENDANTS PATRICK GRUHN, ROBIN MATZKE,  
AND LOREM IPSUM UG'S MOTION TO DISMISS AND DEFENDANT  
BRANDON WILLIAMS'S MOTION TO DISMISS OR FOR SUMMARY JUDGMENT**

I, Stephen Ehrenberg, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a member of the Bar of the State of New York and a partner of the law firm Sullivan & Cromwell LLP, counsel to FTX Trading Ltd. and Maclaurin Investments Ltd. f/k/a

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<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

Alameda Ventures Ltd. (the “Plaintiffs”). I am over the age of 21 years and am competent to testify of my own personal knowledge about the matters contained herein. I submit this declaration in support of *Plaintiffs’ Memorandum of Law in Opposition to Defendants Patrick Gruhn, Robin Matzke, and Lorem Ipsum UG’s Motion to Dismiss and Defendant Brandon Williams’s Motion to Dismiss or for Summary Judgment* (the “Opposition”), filed contemporaneously herewith.

1. Attached hereto as **Exhibit 1** is a true and correct copy, to the best of my knowledge and belief, of Patrick Gruhn’s Proof of Claim, No. 4831, dated June 30, 2023.

2. Attached hereto as **Exhibit 2** is a true and correct copy, to the best of my knowledge and belief, of Lorem Ipsum UG’s Proof of Claim, No. 4476, dated June 30, 2023.

3. Attached hereto as **Exhibit 3** is a true and correct copy, to the best of my knowledge and belief, of Robin Matzke’s Proof of Claim, No. 50116, dated September 10, 2023.

4. Attached hereto as **Exhibit 4** is a true and correct copy, to the best of my knowledge and belief, of excerpts from the transcript of proceedings in the case of *United States v. Ellison*, No. 22-cr-673 (RA) before the United States District Court for the Southern District of New York on December 19, 2022.

5. Attached hereto as **Exhibit 5** is a true and correct copy, to the best of my knowledge and belief, of excerpts from the transcript of proceedings in the case of *United States v. Bankman-Fried*, No. 22-cr-673 (LAK) before the United States District Court for the Southern District of New York on October 10–11, 2023.

6. Attached hereto as **Exhibit 6** is a true and correct copy, to the best of my knowledge and belief, of excerpts from the transcript of proceedings in the case of *United States v.*

*Bankman-Fried*, No. 22-cr-673 (LAK) before the United States District Court for the Southern District of New York on October 16, 2023.

7. Attached hereto as **Exhibit 7** is a true and correct copy, to the best of my knowledge and belief, of excerpts from the transcript of proceedings in the case of *United States v. Bankman-Fried*, No. 22-cr-673 (LAK) before the United States District Court for the Southern District of New York on October 19, 2023.

8. Attached hereto as **Exhibit 8** is a true and correct copy, to the best of my knowledge and belief, of a document obtained from computer files Plaintiffs understand to be attributable to Daniel Friedberg, bearing Bates Nos. FTX\_EU\_000064315–FTX\_EU\_000064369.

9. Attached hereto as **Exhibit 9** is a true and correct copy, to the best of my knowledge and belief, of an attachment to an e-mail indicating that it was sent by Patrick Gruhn to can@ftx.com on July 10, 2022, bearing Bates Nos. FTX\_EU\_000030594–FTX\_EU\_000030625.

10. Attached hereto as **Exhibit 10** is a true and correct copy, to the best of my knowledge and belief, of a Slack message thread entitled “kyc-turbo”, dated December 15, 2021, bearing Bates Nos. FTX\_EU\_000003406–FTX\_EU\_000003408.

11. Attached hereto as **Exhibit 11** is a true and correct copy, to the best of my knowledge and belief, of an attachment to an e-mail indicating that it was sent by Robin Matzke to Daniel Friedberg on September 30, 2020, bearing Bates Nos. FTX\_EU\_000000137–FTX\_EU\_000000140.

12. Attached hereto as **Exhibit 12** is a true and correct copy, to the best of my knowledge and belief, of an online news release published by PRNewswire entitled “FTX Continues Global Expansion with the Establishment of FTX Europe,” dated March 7, 2022, available at <https://www.prnewswire.com/news-releases/ftx-continues-global-expansion-with->

the-establishment-of-ftx-europe-

301496387.html#:~:text=HERISAU%2C%20Switzerland%2C%20March%207%2C,Europe%20and%20the%20Middle%20East.

13. Attached hereto as **Exhibit 13** is a true and correct copy, to the best of my knowledge and belief, of a document obtained from computer files Plaintiffs understand to be attributable to Daniel Friedberg, bearing Bates Nos. FTX\_EU\_000031633–FTX\_EU\_000031636.

14. Attached hereto as **Exhibit 14** is a true and correct copy, to the best of my knowledge and belief, of Government Exhibit 1051 in the case of *United States v. Bankman-Fried*, No. 22-cr-673 (LAK) before the United States District Court for the Southern District of New York on October 18, 2023.

15. Attached hereto as **Exhibit 15** is a true and correct copy, to the best of my knowledge and belief, of Government Exhibit 1004 in the case of *United States v. Bankman-Fried*, No. 22-cr-673 (LAK) before the United States District Court for the Southern District of New York on October 18, 2023.

16. Attached hereto as **Exhibit 16** is a true and correct copy, to the best of my knowledge and belief, of The Debtors' First Request for Production of Documents to Defendant Brandon Williams, dated October 13, 2023.

17. Attached hereto as **Exhibit 17** is a true and correct copy, to the best of my knowledge and belief, of The Debtors' First Request for Production of Documents to Defendants Robin Matzke and Lorem Ipsum UG, dated October 13, 2023.

18. Attached hereto as **Exhibit 18** is a true and correct copy, to the best of my knowledge and belief, of The Debtors' First Request for Production of Documents to Defendant Patrick Gruhn, dated October 13, 2023.

19. Attached hereto as **Exhibit 19** is a true and correct copy, to the best of my knowledge and belief, of Defendant Brandon Williams's Initial Rule 26(a)(1) Disclosures, dated September 27, 2023.

20. Attached hereto as **Exhibit 20** is a true and correct copy, to the best of my knowledge and belief, of Initial Disclosures pursuant to Fed. R. Civ. P. 26(A)(1) of Defendants Lorem Ipsum UG, Patrick Gruhn, and Robin Matzke, dated September 27, 2023.

21. Attached hereto as **Exhibit 21** is a true and correct copy, to the best of my knowledge and belief, of an email chain between Plaintiffs' counsel, Defendant Williams' counsel, and Defendants Gruhn, Matzke, and Lorem Ipsum UG's counsel, containing communications from November 2, 2023 through November 7, 2023.

I declare under penalty of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on December 15, 2023.

/s/ Stephen Ehrenberg  
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